### UNITED STATES BANKRUPTCY COURT

# Eastern District of Pennsylvania

## Philadelphia Division

In re:

Campisi Construction, Inc.

Debtor

ECI, LLC.

٧.

Movant

Campisi Construction

Debtor/Respondent

Lynn E. Feldman

Trustee/Respondent

Anthony G. Campisi

Co-Debtor/Respondent

Chapter 7

Case No. 14-12458



# RESPONSE TO MOVANT'S CERTIFICATION OF AMOUNT DUE ON PROOF OF CLAIM #7 AND MOTION TO REMAND

I Anthony Campisi, hereby certify as follows:

- Anthony Campisi co-debtor, previously President and sole owner/shareholder of 1. Campisi Construction make this certification of objection of ECI, LLC's motion.
- I make this certification wanting to prove the wrong doings of movant (ECI/Cougar) and their lawyer in Montgomery County Robert Saracini.
- 3. ECI'S State Court Judgment is an invalid judgment based on an arbitration that was never finalized.
- ECI and Campisi at arbitration June 1, 2012, decided to attend another arbitration for the intentions of a GLOBAL SETTLEMENT. See E-mail **EXHIBIT A**
- The Arbitrator acknowledged the July 27th email and asked for additional information which was provided by Mr. Spause. See Aug 2<sup>nd</sup> e-mail **EXHIBIT B** 6.

- 6. September 12, 2013 the arbitrator had faxed a decision based on the incomplete arbitration knowingly we wanted a global settlement. His decision clearly states (page 4 paragraph 1) "I do find that each contract or business experience between the parties which was a greater course of dealing must be analyzed to obtain a fair and equitable resolution for the parties" EXHIBIT C
- 7. On April 8, 2013 before ECI entered judgment Mr. Spause under oath admitted owing Campisi Construction 20 thousand dollars and not offsetting arbitration.

#### **EXHIBIT D**

- 8. On July 1, 2013 ECI filed a petition to Confirm Award (montco 2011-12517 seq 10) see **EXHIBIT E**
- 9. ECI knowingly filed the Arbitration award without offsetting monies owed to Campisi and included interest based on CASPA in which he was not awarded. This would constitute as a false claim.

  EXHIBIT F
- 10. Page 3 of arbitration decision finding for Campisi on subcontractor payment act **EXHIBIT G**
- 11. ECI's Claim # 7 is a false claim see forensic accounting report EXHIBIT H
- 12. ECI' Claim # 11 is a false claim see amended proof of claim based on CASPA and under oath (February 18, 2015 depositions) admitted not paying the fee's he claimed

#### **EXHIBIT I**

13. Cougars proof of claim # 9 is false as Mr. Spause admitted under oath that it was a shop rental (listed in exhibit B) not a lease and was to be included in the Global Settlement

### **EXHIBIT J**

14. Mr. Spause admits under oath ECI and Campisi were to attend another arbitration with the intentions of a Global Settlement.

In conclusion, ECI/Spause have been manipulating the court systems in this case for 13 years. The judgments he gets are from trickery and fraud. His claims are all false. His tricks are proved in this filing as Mr. Pellegrino continues to do the same. I have know ECI for 20 years he has known my address for 20 years, yet his filing was sent to another address so I would not receive. He sends short postage, certified mail that gets returned to sender no signature side displayed, he even made up a business closed stamp.

### **EXHIBIT L**

**WHEREFORE**, Anthony Campisi prays this Honorable Court denies ECIs Motion to Remand investigates the false claims and vacates judgments. The settlement and judgment credits will be discussed in the motion for sanctions.